

### REMARKS

Reconsideration of the application in view of the following remarks is respectfully requested. No claims have been added or amended. Claims 1-6, 8-22, and 24-32 are currently pending in the application.

#### Claim Rejections – 35 U.S.C. § 102(e)

In the Final Office Action, the Examiner rejected Claims 1-8, 14-24, and 30-32 under 35 U.S.C. § 102(e) as being anticipated by Worden (U.S. 2003/0149934 A1, filed 05/2001). This rejection is respectfully traversed.

#### Independent Claim 1

Claim 1 currently recites:

A computer-implemented method for generating a transformation document, comprising:  
analyzing a first document;  
analyzing a second document; and  
automatically generating, based upon said first and second documents, a transformation document which, when processed in conjunction with said first document, gives rise to a result document that is at least an approximation of said second document (emphasis added).

Claim 1 provides an advantageous method for automatically generating a transformation document. According to Claim 1, a computer-implemented method analyzes a first document and a second document and automatically generates, based upon the first and second documents, a transformation document. Once generated, the transformation document can be processed in conjunction with the first document to give rise to a result document that is at least an approximation of the second document. Traditionally, such transformation documents had to be produced manually, which

required a significant amount of human resources. With the method of Claim 1, however, these transformation documents can now be generated automatically.

Such a method is neither disclosed nor suggested by Worden. Instead, Worden discloses a method for transforming a document in a first XML language into a document in a second XML language. Worden does this by transforming the document in the first XML language into a common class model, and then transforming the common class model into a document in the second XML language [paragraph 0035]. Basically, rather than transforming the document directly from the first XML language into the second XML language, Worden goes through an intermediate common class model step. According to Worden, this helps to reduce the number of transformation documents that need to be created.

In Worden, several mappings are provided. A first mapping maps the first XML language to the common class model [paragraph 0028]. A second mapping maps the common class model to the second XML language. These mappings, which may be in an XML form called Meaning Definition Language (MDL), are used to generate one or more transformation documents [paragraph 0040]. Once generated, the transformation document(s) are used to transform a document in the first XML language into a document in the second XML language [paragraph 0041].

In rejecting claim 1, the Examiner interpreted the first mapping of Worden to be the first document of claim 1, interpreted the second mapping of Worden to be the second document of claim 1, and asserted that the first and second mappings are used to automatically generate a transformation document. Based upon these interpretations and assertions, the Examiner concluded that claim 1 is fully disclosed by Worden. While

Applicant can see the Examiner's point, Applicant respectfully submits that the Examiner's conclusion is flawed in that it ignores a significant limitation of claim 1.

To illustrate this point, reference will be made to the two enclosed drawings. Drawing 1 shows the various documents involved in the methodology of Worden. The Worden methodology involves a first mapping 101 that maps a first XML language to a common class model, and a second mapping 102 that maps the common class model to a second XML language. These mappings are used to generate one or more transformation documents 103. Once generated, the transformation documents 103 are applied to a document 104 in the first XML language to transform that document into a result document 105 that is in the second XML language.

Drawing 2 shows the various documents involved in the method of claim 1. As shown, claim 1 involves a first document 201 and a second document 202. Based upon these documents, a transformation document 203 is automatically generated. Once generated, the transformation document 203 can be processed in conjunction with the first document 201 to give rise to a result document 204 that at least approximates the second document 202.

In rejecting claim 1, the Examiner interpreted mapping 101 as first document 201, interpreted mapping 102 as second document 202, interpreted transformation document(s) 103 as transformation document 203, and asserted that transformation document(s) 103 are automatically generated based upon mappings 101 and 102, just as transformation document 203 is automatically generated based upon documents 201 and 201. For the sake of argument, it will be assumed that these interpretations and assertions are correct. Even if this were true, however, Worden would still not disclose the method

of claim 1 because, unlike claim 1, the transformation document(s) 103 of Worden cannot be processed in conjunction with mapping 101 (first document) to give rise to a result document that is an approximation of mapping 102 (second document). In Worden, the transformation document(s) 103 is not meant to be nor is it applied to mapping 101 (first document). Rather, it is applied to a completely different document (document 104 in a first XML language) to transform that document into a result document 105. If the transformation document(s) 103 were applied to mapping 101 (first document), it would not give rise to anything that would even remotely resemble mapping 102 (second document). Thus, unlike claim 1 in which the transformation document 203 can be processed in conjunction with the first document 201 to give rise to a result document 204 that approximates the second document 202, Worden does not disclose or suggest that the transformation document(s) 103 can be processed in conjunction with the first mapping 101 to give rise to a result document that approximates the second mapping 102. This aspect of claim 1 is completely missing from Worden. Thus, for at least this reason, Applicant submits that claim 1 is patentable over Worden.

Applicant further submits that dependent Claims 2-8, and 14-16, which depend from Claim 1 and which recite further advantageous aspects of the invention, are likewise patentable over Worden for at least the reasons given above in connection with Claim 1.

Claims 17-24, and 30-32 include limitations similar to Claims 1-8, and 14-16, except in the context of computer-readable media. It is therefore respectfully submitted that Claims 17-24, and 30-32 are patentable over Worden for at least the reasons given above with respect to Claims 1-8, and 14-16.

Claim Rejections – 35 U.S.C. § 103(a)

In the Final Office Action, the Examiner rejected Claims 9-11 and 25-27 under 35 U.S.C. § 103(a) as being unpatentable over Worden as applied to Claims 1 and 17 above, and further in view of Wheeler et al. (U.S. 2002/0055932 A1, filed 08/06/2001). This rejection is respectfully traversed.

For the sake of argument, it will be assumed that Wheeler discloses the subject matter as contended by the Examiner, and that it would have been obvious to combine the references. Even if this were true, however, the combination of Worden and Wheeler still would not produce the method of Claims 9-11. As argued above in connection with Claim 1 (from which Claims 9-11 depend), Worden fails to disclose or suggest as least one aspect of Claim 1. Wheeler et al. has the same deficiency in that it also fails to disclose or suggest this aspect of claim 1. Therefore, even if the references were combined, they still would not produce the method of claim 1. Thus, Applicant submits that Claim 1 is patentable over Worden and Wheeler et al., taken individually or in combination. Applicant further submits that Claims 9-11, which depend from Claim 1, and which recite further advantageous aspects of the invention, are likewise patentable over Worden and Wheeler et al. for at least the reasons given above in connection with Claim 1.

Claims 25-27 include limitations similar to Claims 9-11, except in the context of computer-readable-media. It is therefore respectfully submitted that Claims 25-27 are patentable over Worden and Wheeler et al. for at least the reasons given above with respect to Claims 9-11.

Claim Rejections – 35 U.S.C. § 103(a)

In the Final Office Action, the Examiner rejected Claims 12 and 28 under 35 U.S.C. § 103(a) as being unpatentable over Worden further in view of Wheeler as applied to Claims 11 and 27 above, and further in view of Weinberg et al. (U.S. 2002/0194196 A1, priority filed 10/2000). This rejection is respectfully traversed.

For the sake of argument, it will be assumed that Wheeler et al. and Weinberg et al. disclose the subject matter as contended by the Examiner, and that it would have been obvious to combine the references. Even if this were true, however, the combination of Worden, Wheeler et al., and Weinberg et al. still would not produce the method of Claim 12. As argued above in connection with Claim 1 (from which Claim 12 depends), Worden fails to disclose or suggest at least one aspect of Claim 1. Wheeler et al. and Weinberg et al. have the same deficiency in that they fail to disclose or suggest this aspect of claim 1. Therefore, even if the references were combined, they still would not produce the method of Claim 1. Thus, Applicant submits that Claim 1 is patentable over Worden, Wheeler et al., and Weinberg et al., taken individually or in combination. Applicant further submits that Claim 12, which depends from Claim 1, and which recites further advantageous aspects of the invention, is likewise patentable over Worden, Wheeler et al., and Weinberg et al. for at least the reasons given above in connection with Claim 1.

Claim 28 includes limitations similar to Claim 12, except in the context of computer-readable media. It is therefore respectfully submitted that Claim 28 is

patentable over Worden, Wheeler et al., and Weinberg et al. for at least the reasons given above with respect to Claim 12.

Claim Rejections – 35 U.S.C. § 103(a)

In the Final Office Action, the Examiner rejected Claims 13 and 29 under 35 U.S.C. § 103(a) as being unpatentable over Worden as applied to Claims 1 and 17 above, and further in view of Wheeler et al. (U.S. 2002/0055932 A1, filed 08/06/2001) and Menke (U.S. 2002/0123878 A1, filed 02/2001). This rejection is respectfully traversed.

For the sake of argument, it will be assumed that Wheeler et al. and Menke disclose the subject matter as contended by the Examiner, and that it would have been obvious to combine the references. Even if this were true, however, the combination of Worden, Wheeler et al., and Menke still would not produce the method of Claim 13. As argued above in connection with Claim 1 (from which Claim 13 depends), Worden fails to disclose or suggest at least one aspect of Claim 1. Wheeler et al. and Menke have the same deficiency in that they also fail to disclose or suggest this aspect of claim 1. Therefore, even if the references were combined, they still would not produce the method of Claim 1. Thus, Applicant submits that Claim 1 is patentable over Worden, Wheeler et al., and Menke, taken individually or in combination. Applicant further submits that Claim 13, which depends from Claim 1, and which recites further advantageous aspects of the invention, is likewise patentable over Worden, Wheeler et al., and Menke for at least the reasons given above in connection with Claim 1.

Claim 29 includes limitations similar to Claims 13, except in the context of computer-readable media. It is therefore respectfully submitted that Claim 29 is

patentable over Worden, Wheeler et al., and Menke for at least the reasons given above with respect to Claim 29.

Conclusion

For the reasons given above, Applicant submits that the pending claims are patentable over the art of record, including the art cited but not applied. Accordingly, allowance of all pending claims is respectfully solicited.

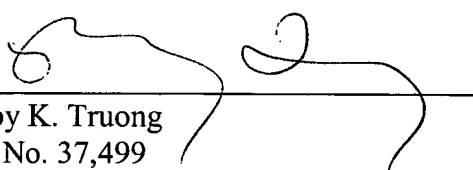
The Examiner is invited to telephone the undersigned to discuss any issue that may advance prosecution.

No fee is believed to be due specifically in connection with this Reply. The Commissioner is authorized to charge any fee that may be due in connection with this Reply to our Deposit Account No. 50-1302.

Respectfully submitted,

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